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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSIE C. MALLONEE,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:23-cv-00205-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(SECOND REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 16, filed on May 8, 2023), currently due on July 5, 2023, by 35 days, through and including August 9, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's second request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload, as described below. The Office of the General Counsel is experiencing a workload surge. The undersigned counsel has five briefing deadlines in

1 three workdays next week. Although counsel has exercised due diligence managing his workload, the
2 requested additional time is necessary.

3 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's
4 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response
5 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.
6 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for any inconvenience.

8 On June 30, 2023, Defendant conferred with Plaintiff's counsel, who has no opposition to this
9 motion.

10 It is therefore respectfully requested that Defendant be granted a second extension of time to
11 respond to Plaintiff's Motion for Reversal and Remand, through and including August 9, 2023.

12
13 Dated: June 30, 2023

Respectfully submitted,

14 JASON M. FRIERSON
15 United States Attorney

16 /s/ Michael J. Mullen
MICHAEL J. MULLEN

17 Special Assistant United States Attorney
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21 IT IS SO ORDERED:

22 
UNITED STATES MAGISTRATE JUDGE

23 7-7-2023
24 DATED: _____
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CERTIFICATE OF SERVICE

I, Michael J. Mullen, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME (*SECOND REQUEST*)** on the date, and via the method of service, identified below:

CM/ECF:

Marc Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

Leonard Stone
lstone@shookandstone.com
Attorney for Plaintiff

Dated: June 30, 2023

/s/ Michael J. Mullen
MICHAEL J. MULLEN
Special Assistant United States Attorney